

EXHIBIT L

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SOKOLOW, *ET AL.*,

Plaintiffs,

v.

PALESTINIAN LIBERATION ORGANIZATION, *ET AL.*,

Defendants.

04 Civ. 00397 (GBD) (RLE)

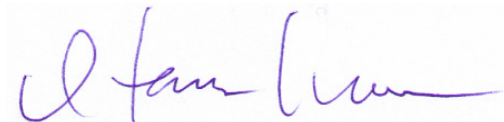
DECLARATION OF ITAMAR MARCUS

Itamar Marcus hereby declares pursuant to 28 U.S.C. § 1746, as follows:

1. The attached Expert Report of Itamar Marcus in *Sokolow v. Palestinian Liberation Organization*, Case No. 04-00397 (S.D.N.Y.), dated March 22, 2013, is a true and accurate copy of the expert report that I submitted in the above-referenced case.

2. The attached expert report is a true and accurate reflection of my opinions in this matter, except that certain of the translations quoted within have been slightly modified since I submitted this report. The modifications to the translations, however, do not alter the opinions as set forth in my expert report.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



ITAMAR MARCUS

Dated: March 17, 2014

Expert Report of Itamar Marcus, Director of Palestinian Media Watch

Qualifications

I am the founder and Director of Palestinian Media Watch (PMW). PMW was founded in 1996. It is a research institute that studies Palestinian society, political activities and ideology, in the West Bank and the Gaza Strip, through the monitoring of activities, publications, speeches, culture, sports, education and communications made or transmitted by Palestinian leaders and by and through PA governmental organizations or structures they control, as they are reported in the media, schoolbooks, internet, etc.

Sources include newspapers; television; radio; speeches, statements, reports, and announcements from government and society leaders and governmental institutions; and the internet. All materials are studied in their original Arabic. In these sources, PMW identifies ideologies, political processes and tactics, and social trends in the West Bank and in the Gaza Strip with special focus on Israeli-Palestinian relations, particularly the peace process. PMW documents and publishes examples and analyses of its findings in written reports and videos.

As founder and Director, I monitor, study, and am responsible for the activities, analyses, and publications of PMW. PMW employs Arabic-language researchers who read the 3 daily newspapers in the Palestinian Authority, *Al-Hayat Al-Jadida*, *Al-Ayyam*, and *Al-Quds*. Additionally, PMW staff records and views television channels produced and broadcasted in the West Bank and the Gaza Strip, including Palestinian Authority Television (PA TV), PA Palestine Live TV, and Al-Aqsa TV of Hamas. Materials are read and recorded based on a list of approximately 30 topics, including the peace process, demonization, women's issues, children, martyrs and martyrdom, and violence. All original written sources are cut out from original sources and saved. All television sources are recorded and saved. Materials of particular significance are released to the public in short reports, press releases, editorials, newspaper articles, special reports, and at press conferences.

We use these materials to analyze, interpret, and report on political and social trends, violence, glorification of terror, and more as indicators of Palestinian policy and tactics towards achieving political goals.

PMW has presented its findings before members of United States Congress; members of Parliament in numerous countries, including the European Union, United Kingdom, France, Norway, Sweden, Denmark, Holland, Switzerland, Canada, Italy, Germany, and Australia; and at universities and conferences worldwide.

I regularly give interviews to Israeli and foreign media, including all of the major television and radio channels in Israel and leading foreign news outlets, including BBC, CNN and Fox News, Italian TV, Russian TV, German TV, Norwegian TV and others. I have also given interviews for documentary films about Palestinian society and Islamic issues.

Some of the political trends PMW has noticed and reported on include a report published on September 10, 2000, which opened with the words: "Palestinian Authority [PA] television broadcasting of violence and hate has reached unprecedented levels this summer and has created an atmosphere of the eve of outbreak of war." At the end of the month, the Palestinian Authority launched 5-years of violence known as the Intifada. In February 2006, PMW

among us. We still have a generous leadership, and we still have a people that has never been sparing and will spare no sacrifice for this blessed land, for this homeland, for Jerusalem and the holy places, and for every inch of the pure land of beloved Palestine. Honored brothers, this is a great event: The souls of the noble Martyrs envelop us, and their souls tell us to follow in their path."

[PA TV (Fatah), May 31, 2012 Exhibit 1 - DVD]

Official PA TV also honored the 91 terrorists on a special TV show for youth. This is how the young TV hosts described the suicide bomber Jaareh to Palestinian youth:

PA TV Host: "Unfortunately, we couldn't part from them (the 91 terrorists) or even embrace them, but were satisfied standing before their bodies, standing up before their sanctified message: The homeland won't die, but we will die for it."

Co-Host: "These are more honored than all of us... **They are the greatest role models for us...**"

[PA TV (Fatah), June 3, 2012, Exhibit 1 - DVD]

As mentioned Ali Jaareh, who murdered Stuart Goldberg was one of those being honored as a Palestinian Authority hero for his act of suicide bombing. In addition, PA TV also honored him, together with another suicide bomber who murdered 8 in a different bus bombing, separately at their joint funeral- burial, referring to Jaareh as "**candle that lights the tunnel of liberty**":

"This is Palestine, which embraces its Martyr sons who are more honored than all of us, and which sends a message to the whole world that our Martyrs are not numbers, but rather a candle that lights the tunnel of liberty for the Palestinian people on the way to independence."

[PA TV (Fatah), 01/06/2012 Exhibit 1 - DVD]

Terrorist Wafa Idris

Wafa Idris was the first Palestinian female suicide bomber. **Her suicide attack injured the plaintiffs Mark, Rena, Jamie, and Lauren Sokolow, when she blew herself up in Jerusalem**, killing one and injuring more than 150 on Jan. 27, 2002. As a volunteer for the Palestinian Red Crescent, she was able to bypass Israeli security and enter Jerusalem in a Palestinian ambulance.

The official handwritten report of the Palestinian Authority Ministry of Welfare, from the division of the Institute for the families of Martyrs and wounded, is indicative of the PA's support for suicide terror in general and this suicide bombing against civilians in particular. Under the section [REDACTED] the following words appear:

[REDACTED]

Martyrdom-Seeking operation is the Palestinian Authority's euphemism for a suicide bombing, because the terrorist is planning to become a "Martyr". A Martyr is the translation of the word "Shahid" which is an Islamic religious status accorded to a person who "died for Allah". There is no higher status that a Muslim can achieve today, according to PA religious teachings, than to be a *Shahid*. Merely defining Idris and other suicide bombers as *Shahids* means that according to official PA their actions of blowing themselves up in order to kill Israelis, were religious act par excellence.

Note also that the Ministry of Welfare defined it not only as [REDACTED] [REDACTED] [REDACTED]

The following are more excerpts from the Miistry official document that

Since Wafa Idris' attack the PA and the media structures they control have repeatedly presented Idris as a hero and role model, naming places and events after her, including a summer camp run by the PA Ministry of youth and sports, which was funded by UNICEF, a Fatah women's military unit, a university students group for Fatah members, a Fatah course, and more. There have been public demonstrations and songs on PA TV to honor her. All of which, as stated, would not be possible if the PA did not both support her attack and want to honor her and have her seen as a role model and hero.

The following are some of these examples:

1. Immediately following the suicide bombing, the Palestinian Authority held a memorial demonstration in her honor. A photograph of this demonstration appeared in a Palestinian daily, featuring posters bearing her picture with the following caption:

"The Fatah Movement, Ramallah branch, Al Aqsa Martyrs' Brigades, eulogize with great pride the heroic Martyr, of the Al-Amari Refugee Camp, the Martyr Wafa Idris."

[*Al-Ayyam*, Feb. 1, 2002]

The demonstrators waving these posters are young girls, perhaps first-graders.

It should also be noted that Yasser Arafat who headed the Palestinian Authority was also the Chairman of Fatah, who was taking direct credit of the attack.



2. Fatah names women's terror unit for attacking Israeli civilians after Wafa Idris:

"Senior officials in the Fatah Movement have said that the Al Aqsa Martyrs' Brigades... has recently created a women's brigade, in order for women to take an active part in the war being fought in the Palestinian areas. The purpose of this brigade is to carry out attacks on the Israeli home front. The unit has been named 'the Brigade in Honor of the Martyr Wafa Idris.'"

[*Al-Quds*, March 1, 2002 Exhibit 30]

3. Fatah students' group named after Wafa Idris has course in democracy and human rights:

"The students' committee of the *Shabiba* [Fatah] student movement, the *Shahida* (Martyr) Wafa Idris cell in the Al-Quds Open University in Tubas, celebrated yesterday the completion of a course in democracy and human rights.

[*Al-Hayat Al-Jadida*, Aug. 11, 2002 Exhibit 31]

4. Summer camp of the PA Ministry of Youth and Sports and funded by UNICEF named after Wafa Idris:

"Yesterday, activities ended in the camp named after the *Shahida* (Martyr) Wafa Idris, for girls in the city of Qalqilya. The camp was founded by the Scout general administration in the Ministry of Youth and Sports. The camp was under the supervision of the Scouts in the Qalqilya Administration and about 100 girls from the organizing committee of the city's Scouts participated... [At the closing ceremonies thanks were given including] to UNICEF for its support of the camps."

[*Al-Ayyam*, July 18, 2003 Exhibit 32]

5. Song glorifying Idris was broadcast many times on PA TV:

"My sister Wafa, my sister Wafa
Oh the heartbeat of pride,
Oh blossom who was on earth and is now in Heaven. (2x)
Allahu Akbar! [Allah is greater]
Oh Palestine of the Arabs,
Allahu Akbar, Oh Wafa!
But you chose *Shahada*(Martyrdom)
In death you have brought life to the aspiration
But you chose *Shahada*
In death you have brought life to the aspiration."

[PA TV (Fatah), first broadcast May 2002 Exhibit 1 - DVD]

6. Fatah named women's course after Wafa Idris:

"The General Security Forces held a graduation ceremony for the *Shahida* (Martyr) Wafa Idris course, for training Fatah women cadres, organized by the Commission in cooperation with the General Union of Women and the Public Relations Department in the Jenin District."

[*Al-Hayat Al-Jadida* (Fatah), July 3, 2005, Exhibit 34]

Among the many articles of praise for Wafa Idris immediately following her suicide bombing, were the following:

7. "Rabiha Dhiab, member of the administrative staff of the Palestinian Women Union emphasized that the participation of [Wafa] Idris in the attack shows the determination and the resolve of the Palestinian woman to participate as full partners in the national struggle, alongside her brothers."

[*Al-Ayyam*, Feb. 1, 2002, Exhibit 35]

8. "Recently, the heroine Wafa Idris succeeded in carrying out the bombing in Jerusalem, and subsequently, the Martyr Darin Abu Aisheh [female suicide bomber whose attack in 2002, injured 2]. These actions... attest to the Palestinian woman's capability to perform successful actions."

[*Al-Hayat Al-Jadida*, March 11, 2002 Exhibit 36]]

9. Attaf Yussuf, a columnist in the media supplement *The Women's Voice*, wrote after Idris' bombing:

"Palestinian women desire to participate alongside the men in all aspects of the struggle."

[*Al-Quds*, March 1, 2002Exhibit 37]

10. "She [Idris] represents the major role of the Palestinian woman in the national struggle... Ziyad Abu Ayin, a member of the high-ranking Movement Committee of Fatah, delivered a speech in which he praised the heroism of Idris, as a member of the Al Aqsa Martyrs' Brigades, which belongs to the Fatah Movement."

[*Al-Ayyam*, Feb. 1, 2002, Exhibit 38]

11. PA TV music video honors Wafa Idris alongside Abbas

A Fatah promotional music video broadcast on PA TV honored Wafa Idris as a Shahida - holy Martyr. This picture of Wafa Idris with the text "The Shahida (Martyr) Wafa Ali Idris" appeared in the PA TV music video, which blended scenes and pictures paying tribute to the PLO, Fatah, Yasser Arafat and PA and Fatah Chairman Mahmoud Abbas.

[PA TV (Fatah),

Dec. 31, 2009, Exhibit 1 - DVD]



12. Football tournament named after Wafa Idris

Headline: "Al-Amari plans to launch the 'Shahida (Martyr) of Honor, Wafa Idris' youth tournament."

"The administration of the Al-Amari youth center has announced its plans to launch a youth tournament (for 20-year-olds) to be named 'Shahida (Martyr) of Honor, Wafa Idris [tournament]'. The Al-Amari administration is maintaining contacts with the Palestinian Football Association for permission. [The tournament] will commence on March 10. Twelve teams will be participating."

[Al-Hayat Al-Jadida, Mar. 6, 2011, Exhibit 43A]

The honors that Idris receives by the PA because of her being the first female suicide bomber, continues until today. The current PA Minister of Prisoners' Affairs has honored Idris on more than one occasion.

13. International Women's day he honored her and other female terrorists "heroism"

"[PA] Minister of Prisoners' Affairs [Issa Karake]... spoke at a ceremony honoring female prisoners in the occupation's (i.e., Israel's) prisons, held by the Ministry [of Prisoners' Affairs] to mark International Women's Day and Mothers' Day..."

[Karake] stated: 'This is the month of heroism and action for the male and female prisoners, and we must act so that their cause will be the most pre-eminent, like their predecessors, such as Dalal Mughrabi, (female bus hijacker, 37 killed in her attack) Darin Abu Aisheh (female suicide bomber, injured 2), Wafa Idris, and all the female Shahids (Martyrs) and prisoners.'

[Al-Hayat Al-Jadida, Mar. 21, 2011, Exhibit 43B]

14. PA Minister honors female suicide bomber Wafa Idris with visit to her family

"[Minister of Prisoners' Affairs, Issa] Karake's statement was made during a visit to the family of prisoner Ahmed Muhammad Ka'abna, who has been serving a life sentence since April 26, 1997& **Karake and a delegation from the Ministry of Prisoners' Affairs... also visited the family of Martyr (Shahida) Wafa Idris**, in the Al-Amari refugee camp, on the occasion of the National Day for Returning the Bodies of the Martyrs, on Aug. 27, 2012. Martyr (Wafa) Idris died a Martyrs' death on Jan. 17, 2002,

and her body is still held in the Israeli numbered cemeteries (i.e., Israeli cemeteries for terrorists). She was a volunteer for the Red Crescent."

[Al-Ayyam, Aug. 30, 2012 Exhibit 43C]

15. A Fatah official praised the "heroic acts" of terrorists Laila Khaled, Dalal Mughrabi and Wafa Idris

"Commissioner of the Central Reform Committee of Fatah, Abu Alaa Hamid **extolled the heroic acts of Palestinian women, among them** fighter (terrorist airplane hijacker) Laila Khaled, who confronted the Zionist enemy in the air and captured its pilots; Martyr (Shahida) Dalal Mughrabi, (terrorist bus hijacker whose terror attack killed 37 civilians) who carried out the first sea landing operation in the modern history of the Palestinian revolution; **and Wafa Idris, the first female Martyr-seeker in the Al-Aqsa Intifada.**"

[Al-Hayat Al-Jadida, Dec. 12, 2012 Exhibit 43D]

16. On January 1, 2013, Fatah celebrated "Launch Day," commemorating the 48th anniversary of Fatah's first terror attack. Next to a picture glorifying violence, the page administrator mentions a number of facts about Fatah history that present murderous terror attacks as glorious and heroic, among them:

"Did you know? The first female Martyrdom-seeker to carry out a military operation in the Palestinian Intifada functioned under the command of the Al-Aqsa Martyrs' Brigade. **It was carried out by Wafa Idris, who was the first girl Martyrdom-seeker of the Al-Aqsa Intifada.**"

[Fatah's Facebook page - Dec. 20, 2012 Exhibit 43E]

The status of suicide bombers as heroes and role models for youth can be seen by how Fatah continues to honor Idris on its official Facebook page: "Wafa's mother said that she is proud of her daughter and hopes that more girls will follow in her footsteps."

Picture posted on Fatah's Facebook page with the following description:

"The eleventh anniversary of Wafa Idris' death as a Martyr.. On January 28, 2002 in the city of Jerusalem, a young Palestinian woman working for the Red Crescent (in an ambulance that enabled her to bypass Israeli security) & Wafa was late in returning, and night fell. Her family began to look for her, and asked some of her girlfriends who said that she had said goodbye to them, and that she had asked them to pray, saying: 'I will do a deed that will make you proud,' but she did not explain what that deed would be. They all remained confused until they found out that Wafa had blown herself up on Jaffa Road (in Jerusalem), killing two Israelis and wounding about one hundred others... Wafa's mother said that when she heard on the media that it could have been a woman who carried out the Martyrdom-seeking operation in Jerusalem and [Wafa] hadn't come back, she thought that this could be the only explanation for her being missing. She added that she is a hero, and said, 'My daughter is a Martyr (Shahida).' ... This is the hero whose name the Zionists will remember well, and so will Palestinians; the hero who sacrificed herself and her body for Palestine and became a symbol of the struggle and of



Palestinian loyalty through one of the most honorable Martyrdom-seeking operations in recent years, which surprised the Zionist enemy and [through] the self-sacrifice of lovely Palestinian girls for the sake of their homeland. Years have passed since that day, and the name of Wafa Idris is still a lesson that terrifies the Jews.

At least 2,000 Palestinians participated in the symbolic funeral of the first female Martyrdom-seeker who blew herself up in Israel. They marched for Wafa Idris behind an empty wooden coffin through the Al-Amari refugee camp in the West Bank. The coffin was draped in the Palestinian flag and posters of Wafa Idris were put on the walls of the streets in the refugee camp. Participants called 'Wafa is a hero' while armed men fired in the air to salute Wafa. Wafa's mother said that she is proud of her daughter, and hopes that more girls will follow in her footsteps. Wafa - the beautiful flower who, through her Martyrdom-seeking operation, turned upside down Israeli security considerations that had focused on observing young Palestinian men only."

[Fatah's Facebook page, Jan. 27, 2013 Exhibit 43F]

An interesting indicator of how glorification of terrorists impacts on the Palestinian population was both this story and how it was reported by the official PA daily:

"Quadruplets born in Shechem [Nablus] were named Yasser, Arafat, Dalal [Dalal Mughrabi, terrorist bus hijacker whose terror attack killed 37 civilians] and Wafa [Wafa Idris]. These are names that represent to every Palestinian support, assistance and love of the symbols of our just issue."

[PA TV (Fatah), Feb. 19, 2002]

The comment about the significance of the names as "symbols of our just issue" was the official PA daily's comment justifying and glorifying the murders.

Terrorist Abdallah Barghouti

Terrorist Abdallah Barghouti built the bombs that were used for suicide bombings in the city of Rishon LeZion, at Zion Square and the Hebrew University cafeteria in Jerusalem and more. **In the Hebrew University bombing, on July 31, 2002. Gritz David, Carter Diana, Coulter Ruth, Blutstein Benjamin, whose families are plaintiffs in this lawsuit, were killed in that terror attack.** Barghouti was sentenced to 67 life-terms in prison for the deaths of 66 Israelis, which was the longest sentence given out in Israel's history.

The PA's attitude towards the terrorists who killed large numbers of Israelis can be seen in the article written by PLO Ambassador to India and regular columnist in the official PA daily, Adli Sadeq. He describes the terror attacks of Abdallah Barghouti and other mass murderers as "quality operations." He wrote an article of praise of Hamas for forcing Israel to release over 1000 terrorists from prison to free kidnapped Israeli hostage Gilad Shilit. At the end he added that it was Israeli "fanaticism and extremism" that made Israel refuse to release "fighters who carried out quality operations, such as Abbas Al-Sayid (35 life sentences for deaths of 35 Israelis in suicide bombings he planned), Ibrahim Hamed (45 life sentences for deaths of 46 Israeli in suicide bombings he planned), **Abdallah Barghouti (67 life sentences for deaths of 66 Israelis in suicide bombings)**, and Thaer Hammad (11 life sentences for deaths of 10 Israelis in a shooting ambush) and others."

[Al-Hayat Al-Jadida, Oct. 13, 2011 Exhibit 43G]